

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

In re:

Case No. 6:19-bk-07981-KSJ

Agape' Assembly Baptist Church, Incorporated,

Chapter 11

Debtor.

**CERTIFICATION OF NECESSITY FOR EMERGENCY MOTION
FOR AN ORDER DIRECTING CLERK OF COURT TO ISSUE
A WRIT OF POSSESSION TO THE UNITED STATES MARSHAL SERVICE**

I HEREBY CERTIFY, as a member of the Bar of the Court, that I have carefully examined the matters under consideration and to the best of my knowledge, information and belief formed after reasonable inquiry, all allegations are well grounded in fact and all contentions are warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law can be made, that the matter under consideration is not interposed for any improper purpose, such as to harass, to cause delay, or to increase the cost of litigation, and there is just cause to request a consideration of the following pleading on an emergency basis – or without a hearing – as the Debtor is still in possession of the Palazzo Property, despite the requirement to turn over possession to Herring Bank, as Trustee by the Sale Order (as defined herein), and direct, immediate and substantial harm may result if a writ of possession does not dispossess the Debtor of the Palazzo Property as the need to protect that property is apparent as a two-alarm fire consumed the Hiawassee Property last night:

**HERRING BANK, AS TRUSTEE FOR THE BONDHOLDERS
OF AGAPE' ASSEMBLY BAPTIST CHURCH, INC.'S EMERGENCY
MOTION FOR AN ORDER DIRECTING CLERK OF COURT TO ISSUE
A WRIT OF POSSESSION TO THE UNITED STATES MARSHAL SERVICE**

Dated: October 26, 2021.

/s/ Ryan C. Reinert

RYAN C. REINERT

Florida Bar No. 0081989

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– and –

C. JARED KNIGHT (*Admitted Pro Hac Vice*)

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Attorneys for Herring Bank, as Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and copy of the foregoing has been provided this
October 26, 2021, through the CM/ECF system to:

Audrey M. Aleskovsky

Office of the United States Trustee

George C. Young Federal Building

400 West Washington St, Suite 1100

Orlando, FL 32801

With a copy by U.S. Mail and Electronic Mail to:

Agape' Assembly Baptist Church, Incorporated

2425 N. Hiawasse Rd.

Orlando, FL 32818

c/o Ingrid Bishop (dringridbishop@gmail.com)

/s/ Ryan C. Reinert

Attorney